

UNITED STATES DISTRICT COURT  
FIRST DISTRICT OF MASSACHUSETTS

DESIREE M. ALLAIRE,

Plaintiff

Civil Action No.:  
03-12566-RWZ

vs.

JODAN KALEMRA, alias, a/k/a JODAN KALEMBA  
RYDER TRUCK RENTAL, LT., RTRT, INC. in its  
capacity as trustee for the Ryder Truck Rental, Lt.  
RYDER TRUCK RENTAL, INC.,  
IRON MOUNTAIN OFF-SITE DATA, INC. f/k/a  
ARCUS DATA SECURITY, INC.,  
JOHN DOES 1-5

Defendants

FILING FEE PAID:  
RECEIPT # 542/6  
AMOUNT \$ 50.00  
BY DPTY CLK/ ja  
DATE 3/2/04

**PLAINTIFF'S MOTION FOR LEAVE  
OF COURT TO PERMIT OUT-OF-STATE  
COUNSEL TO PRACTICE IN THIS COURT**

The plaintiff, Desiree M. Allaire (Allaire), hereby moves for leave of court to permit Michael J. Lepizzera, Jr. (Lepizzera) to appear on Allaire's behalf *pro hac vice* pursuant to Local Rule 83.5.3.

In support of the motion, the plaintiff has attached an affidavit executed by Lepizzera which establishes the following:

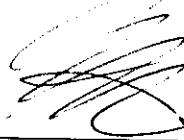
1. Lepizzera is a member of the bar in good standing in every jurisdiction where he has been admitted to practice.
2. There are no disciplinary proceedings pending against Lepizzera as a member of the bar in any jurisdiction.

3. Lepizzera is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

The undersigned counsel filing this application to practice on behalf of Lepizzera is a member of the bar of the United States District Court for the District of Massachusetts. The undersigned counsel has also filed an appearance on behalf of Allaire in this matter.

For all the foregoing reasons, the plaintiff respectfully requests that the motion for leave to permit out-of-state counsel to practice in this court be granted.

Plaintiff, Desiree M. Allaire  
By her attorney,



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Scott DeMello, BBO#566981  
**DEMELLO & CLARK**  
109 Oak Street  
Newton, MA 02464  
(617) 630-8150  
(617) 630-8191 (Fax)

Dated: March 2, 2004

**CERTIFICATE OF SERVICE**

I, Scott DeMello, Esq. hereby certify that on this 2<sup>nd</sup> day of March, 2004, I served a true copy of the foregoing Motion by mailing, first-class mail to the following: Heather E. Davies, Esq., Mark B. Lavoie, Esq., McDonough, Hackin & Lavoie, LLP, 6 Beacon Street, Suite 815, Boston, MA 02108, Ryder Truck Rental, Lt., 101 Federal Street, Boston, MA 02110, RTRT, Inc., 84 State Street, Boston, MA 02109 and Ryder Truck Rental, Inc., 220 Tapley Street, Springfield, MA 01104.



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